

EXHIBIT A



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

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BY FEDERAL EXPRESS

Samuel Nitze

Alex Spiro

Sara Clark

JP Kernisan

Maaren Shah

Quinn Emanuel Urquhart & Sullivan, LLP

51 Madison Avenue, 22nd Floor

New York, NY 10010

Counsel for Charlie Javice

Re: *United States v. Charlie Javice et al., S1 23 Cr. 251 (AKH)*

Dear Counsel:

This letter provides additional discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure (“Fed. R. Crim. P.”). We are providing a hard drive containing a copy of materials that are stamped USAO_00031527 - USAO_00031546 and CJ_USAO_00002 – CJ_USAO_000039, as detailed below.

The materials enclosed herewith, including this letter, are subject to the protective order governing the disclosure of discovery materials under Fed. R. Crim. P. 16 (Dkt. No. 63), and are designated, pursuant to the protective order, as indicated in the table below. The Government will continue to produce discovery materials pursuant to Fed. R. Crim. P. 16 on a rolling basis.

Bates Range	Description	Designation
USAO_00031527 - USAO_00031546; CJ_USAO_00002 - CJ_USAO_00037	Materials Produced by Google LLC in Response to Search Warrant 23 Mag. 6178 Associated with charlie@withfrank.org	Confidential
CJ_USAO_00038 - CJ_USAO_00039	Materials Produced by Dropbox Inc. in Response to Search Warrant 23 Mag. 6105 Associated with chjavice@gmail.com and charlie@withfrank.org	Confidential

The Government recognizes its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny and will provide timely disclosure of any such material.

The Government will provide material under *Giglio v. United States*, 405 U.S. 150, 154 (1972), and its progeny, in a timely manner prior to trial.

The Government reiterates its request for reciprocal discovery under Federal Rule of Criminal Procedure 16(b).

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

By:


Micah F. Fergenson
Dina McLeod
Assistant United States Attorneys
212-637-2190 / -1040